

July 8, 2022

By ECFMagistrate Judge James R. Cho
U.S. District Court,
Eastern District of New York**Re: *Chow v. SentosaCare, LLC et al.*, No. 1:19-cv-03541-FB-JRC
Joint Letter Regarding Summary Judgment Motions**

Dear Judge Cho:

Plaintiff Walter Chow (“Plaintiff”) and Defendants SentosaCare LLC et al. (“Defendants”) (collectively, the “Parties”) write jointly to request that the Court postpone briefing on the Parties’ anticipated summary judgment motions until after the Court has decided Plaintiff’s motion for class certification. On June 21, 2022, Plaintiff filed his pre-motion letter in connection with class certification. ECF No. 112.

Because both parties plan on bringing summary judgment motions in this action, they have agreed that in order to promote judicial efficiency and avoid implicating the one-way intervention rule, the parties should schedule their summary judgment motions after the Court has decided Plaintiff’s motion for class certification. *See e.g. Kurtz v. Kimberly-Clark Corporation*, 321 F.R.D. 482, 507 (E.D.N.Y. 2017) (“[T]he traditional route—deciding class certification prior to deciding summary judgment—is sensible”). After the Court decides class certification, the parties will promptly propose a briefing schedule for summary judgment motions.

The parties thank the Court for its time and attention on this matter.

Respectfully submitted,

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